

EXHIBIT A

Owen Diaz Employment Status:

“Plaintiff Owen Diaz was employed by defendant Tesla, Inc. . . . at the Tesla factory in Fremont, California, from June 2015 to March 2016.”

It has been conclusively determined that Tesla is liable to Mr. Diaz for:

- 1. Creating a hostile work environment based on race;**
- 2. Failing to prevent racial harassment.**

Punitive Damages Against Tesla Inc.

- 1. “It has been established that Tesla’s conduct that harmed Mr. Diaz was malicious, oppressive, or in reckless disregard of Mr. Diaz’s rights.”**
- 2. “It has been established that Mr. Diaz is entitled to punitive damages.”**
- 3. “It is for you to determine the amount.”**

Compensatory Damages

- 1. “It has been established that Mr. Diaz is entitled to compensatory damages.”**

- 2. “It is for you to determine the amount of damages that have been proved.”**